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Daniel E Goodman LLC

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July 1, 2016

VIA CERTIFIED MAIL, RETURN RECEIPT
REQUESTED & FIRST CLASS US MAIL

Environmental Protection Agency
Ralph H. Metcalfe Federal Building
77 W Jackson Blvd.
Chicago, IL 60604

RE: Vicki Brady v. Timothy Stokes and Paulette Stokes
Date Of Accident: March 4, 2014
Location Of Accident: 5830 North Oconto, Chicago, IL 60631
Chicago Police Report No.: HX172415

Dear Sir or Madam:

Please be advised that I represent Vicki Brady in relation to a personal injury lawsuit that was filed as a result of injuries that she sustained arising out of a slip and fall on the sidewalk which was covered with ice that had accumulated from water from the downspout of the private residence owned by the Defendants, Timothy Stokes and Paulette Stokes at 5830 North Oconto Avenue, Chicago, Illinois on March 4, 2014 at 5830 North Oconto in Chicago, Illinois at approximately 3:15 p.m. You will find enclosed a Subpoena requiring you to provide requested documentation to my office by July 15, 2016.

Your anticipated cooperation is appreciated.

Sincerely,

LAW OFFICE OF DANIEL E GOODMAN, LLC


Michael A. Moore

MAM/mcl
Enclosure

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

VICKI BRADY and MICHAEL LAMMERSFELD

Plaintiff/Petitioner

v.

No. 2015 L 008065

TIMOTHY STOKES and PAULETTE M. STOKES

Defendant/Respondent

SUBPOENA IN A CIVIL MATTER

(For Testimony and/or Documents)

To: Environmental Protection Agency

Ralph H. Metcalfe Federal Building

77 W Jackson Blvd., Chicago, IL 60604

☐ 1. YOU ARE COMMANDED to appear to give your testimony before the Honorable _____
in Room _____, Illinois on _____,
at _____ m.

☐ 2. YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public at:
in Room _____, Illinois on _____,
at _____ m.

☒ 3. YOU ARE COMMANDED to mail the following documents in your possession or control to Law Office of Daniel E Goodman, LLC
at 9701 W. Higgins Rd., Ste. 601, Rosemont, Illinois, 60018, on or before July 15, 2016
at 11:00 a. m.

(THIS IS FOR RECORDS ONLY. THERE WILL BE NO ORAL INTERROGATORIES.)

And all documentation including but not limited to recordings, call logs, correspondence, e-mails, reports, violation notices issued, photographs, diagrams, or any other
documentation/information in your possession regarding complaints made by Vicki Brady and/or Michael Lammersfeld (both residing at 5820 North Oconto, Chicago, IL, 60631)
in relation to the property located at 5820 North Oconto, Chicago, Illinois owned by Timothy Stokes and Paulette Stokes from January 1, 2000 through December 31, 2014.

☐ Description continued on attached page(s).

YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.

Notice to Deponent:

☐ 1. The deponent is a public or private corporation, partnership, association, or governmental agency. The matter(s) on which examination is
requested are as follows: _____

☐ Description continued on attached page(s).

(A nonparty organization has a duty to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf,
and may set forth, for each person designated, the matters on which that person will testify. Ill. Sup. Ct. Rule 206.)

☐ 2. The deponent's testimony will be recorded by use of an audio-visual recording device, operated by _____
(Name of Recording Device Operator)

3. No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except
by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination. Ill. Sup. Ct. Rule 206(d).

Atty. No. 46715

Pro Se 99500

Name: Michael A. Moore / Law Office of Daniel E Goodman, LLC

Atty. for: Plaintiff

Address: 9701 W. Higgins Rd., Ste. 601

City/State/Zip: Rosemont/IL/60018

Telephone: 847-292-6000

Issued by:

Signature

☒ Attorney☐ Clerk of Court

Date: July 1, 2016

☒ I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a)(2), to the above-named recipient
by certified mail, return receipt requested (Receipt # 7015 0540 0001 5103 2939) on July 1, 2016

I paid the witness \$ 25.00 for witness and mileage fees.

☐ I served this subpoena by handing a copy to _____ on _____

I paid the witness \$ _____ for witness and mileage fees.

(Signature of Server)

MICHELLE LEACH

(Print Name)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

JUL 11 2016

Michael A. Moore
Law Office of Daniel E. Goodman, LLC
9701 W. Higgins Rd
Suite 601
Rosemont, Illinois 60018

Re: Vicki Brady v. Timothy Stokes and Paulette Stokes
Date of Accident: March 4, 2014
Location of Accident: 5830 North Oconto, Chicago, IL 60631
Chicago Police Report No: HX172415

Dear Sir:

I am writing in response to the above-referenced subpoena, dated July 1, 2016, and received on July 6, 2016, by the Office of Regional Counsel, United States Environment Protection Agency (EPA) Region 5, Chicago, Illinois. The subpoena issued in the Circuit Court of Cook County, Illinois, commands copies of all documentation including, but not limited to recordings, call logs, correspondence, e-mails, reports, violation notices issued, photographs, diagrams, or any other documentation/information in EPA's possession regarding complaint's made by Vicki Brady and/or Michael Lammersfield (both residing at 5820 North Oconto, Chicago, IL 60631) in relation to the property located at 5820 North Oconto, Chicago, IL owned by Timothy Stokes and Paulette Stokes from January 1, 2000 through December 31, 2014.

The EPA has promulgated regulations with respect to requests for production of documents in proceedings where the United States is not a party. See 40 C.F.R. §§ 2.401 *et seq.* A copy of those regulations is enclosed. Under the regulations, the EPA must determine if a substantive response to a subpoena is clearly in the interest of the Agency. If, in the case of a request for documents, a determination is made that this prerequisite is not met, the Agency will answer the subpoena in accordance with established regulations.

This subpoena relates to a private action in the Circuit Court of Cook County, Illinois. Such actions are not within the scope of responsibilities of the EPA. Therefore, no interest of the Agency would be served in providing a substantive response to the subpoena. Given this finding, we will assume that you will withdraw the subpoena unless we hear further from you.

Enclosed is the \$25.00 check you sent with your subpoena, however, EPA will treat your request for documents listed in the subpoena as a Freedom of Information Act request. A bill will be forwarded to you with your documents. The Region 5 FOIA Office, (312 886-6686) (Mail Code: MRI-9J) will assign your request a FOIA number and direct your request to the proper office(s).

Sincerely,

A handwritten signature in dark ink, appearing to read "T. Leverett Nelson", with a long horizontal flourish extending to the right.

T. Leverett Nelson
Regional Counsel

Enclosure